

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

**ORIGINAL**

CARL G. SIMPSON and BONNIE REED  
SIMPSON, Co-Administrators of the  
Estate of Carl G. Simpson,

Plaintiffs,

vs.

Case No. C-1-000014

INTERMET CORPORATION, ET AL.,

Defendants.

DEPOSITION OF ANGELA COLE

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The deposition of Angela Cole was taken  
on July 15, 2003, at the approximate hour  
of 1:00 p.m., at 215 South Fourth Street,  
Ironton, Ohio.

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1 release the cope from the gas head. But it dropped  
2 and one of the bars gave, and it landed kind of  
3 cockeyed on the drag.

4 Q Were they cleaning out stickers at the  
5 time? You said a cleanout or cleanup.

6 A I don't remember if it was a cleanup or an  
7 install. They may have just been putting the  
8 machine in.

9 Q Changing it over from the I-beams to  
10 the --

11 A To the bedplatess, yeah.

12 Q Okay. Was anybody injured?

13 A No.

14 Q When there were situations in which the  
15 gas head was raised, separated from the cope in  
16 order for cleaning sticker purposes, if the sticker  
17 was in the back of the cope, such that it required  
18 you to put your body inside the machine, did you  
19 ever do that when the machine still had power to it?

20 A No.

21 Q Did you ever see anybody else do it when  
22 the machine was powered?

23 A No.

24 Q So you never saw a supervisor or manager

1 do that when the machine still had power to it?

2 A Not that I know of, no.

3 Q If the sticker in this particular  
4 circumstance couldn't be blown out or -- couldn't be  
5 blown out, and it took a hammer and chisel, or  
6 whatever it is to knock it out, was it regular  
7 practice to put locks on the machine before that  
8 took place?

9 A Yeah.

10 Q And you followed that practice, and you  
11 saw others follow that practice?

12 A Well, I did because I had a newborn baby  
13 at the house. I'm not saying everybody did.

14 Q Did you actually observe employees in that  
15 circumstance I just described getting inside  
16 machines without locking it out?

17 A Yeah. But the power was not engaged.

18 Q The power was off --

19 A The power was off.

20 Q -- but the locks weren't on the switches?

21 A Right.

22 Q Were you in the plant on the day that Carl  
23 Simpson died?

24 A Yes, I was.